

Williams, Christopher

From: Williams, Christopher
Sent: Tuesday, August 22, 2017 1:28 PM
To: 'lbnguyen@sidrich.com'
Subject: Borger EPA Information Request from 16-Aug-2017

Mr. Long Nguyen,

Thank you for meeting with me, and Jim Gold during EPA's site visit to the Borger, TX Cabon Black Manufacturing Facility (the Facility) on August 16, 2017, and accompanying us during our field work. As discussed during the site visit, you agreed to provide us with information **no later than September 4, 2017**. Please provide copies of the following documents and information that we previously requested:

1. From January 1, 2012 through present, a list of all newly installed or replacement Air Preheaters and Blowers for the Facility. Please provide the location and date of installation for the equipment.
2. Copies of both the current TCEQ approved Title V Operating Permit and NSR/PSD Permit.
3. From January 1, 2012 through present, copies of all Title V deviation reports submitted to TCEQ for the Facility.
4. Copies of any current or in-process air permit applications submitted or in contemplation to be submitted to TCEQ for approval for the Facility.
5. Copies of stack test performed pursuant to EPA's 114 request submitted and all subsequent stack tests performed at the Facility.
6. A copy of the complete Title V permit application submitted to TCEQ for the current approved Title V permit for the Facility.
7. A process flow and equipment diagram for the Facility's *combustion air system* that illustrates the location of all air preheaters, blowers and pressure monitoring devices for the system.
8. The location of the two Hoffman model 38606A Blowers which were moved from the Big Spring Plant to the Borger Plant in 2006 (please indicate the location in item number 7, above).
9. From January 1, 2012 through present, all documentation and records required to comply with recordkeeping requirements specified in special conditions of the Facility air permits approved by TCEQ. This includes copies of the workbooks in Microsoft Excel format that EPA and Sid Richardson personnel reviewed during the August 16th site visit which provided information for the daily sulfur content, reportable and non-reportable emissions events, MSS, and other special conditions on several spreadsheets. As indicated during the site visit, EPA is not requesting copies of the visible emissions reading logs.
10. Copies of the calibration gas bottle certificates used for the Dryer and Waste Heat Boiler stack continuous emissions monitoring systems (CEMs) at the time of the inspection.
11. A copy of the process flow and equipment diagram with corresponding Emission Point Numbers (EPNs) that EPA reviewed during the site visit.
12. Copies of all notifications required by 40 CFR §63.1110, including Initial Notification, Notification of Compliance Status report, and Periodic Reports submitted on or after January 1, 2012.

In addition, we request the following additional item be **provided no later than August 28, 2017**:

13. From April 6, 2017 through August 6, 2017, all CEMs data for EPN-122 provided in electronic Microsoft Excel format, including average hourly measurements with respective date and timestamps for NOx in lbs/hr and ppm, total volumetric gas flow rates through the stack in dscf/hr, and percent oxygen (% O2).

Note the three additional requests and the clarification to request 7, which is specific to the combustion air system for the reactors. Please send all responses to me via my contact information listed below and do not hesitate to contact me if you have any questions about this email. Thank you again for your time and efforts to respond to our requests.

Regards,

Chris

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